

ORIGINAL

STEVEN S. ALM  
United States Attorney  
District of Hawaii

ELLIOT ENOKI  
First Assistant U.S. Attorney

THOMAS MUEHLECK  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Building  
300 Ala Moana Blvd., Box 50183  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

JUN 14 2000  
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WALTER A. V. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO.
	)	
Plaintiff,	)	INDICTMENT
	)	
v.	)	[21 U.S.C. §§ 846,
	)	843(b), 841(a)(1); 18
ALEJANDRO GUZMAN,	(01), )	U.S.C. §§ 1952(a)(3),
aka "Toluco,"	)	2]
aka "Eddy,"	)	
ERIK ZUNIGA-MENDEZ,	(02), )	
MARGARITA ELENA SANTOS,	(03), )	
aka "The Old Lady,"	)	
JAIME MEJIA GARCIA,	(04), )	
LORENA ISABEL LEON OSORIO,	(05), )	
aka "Myrna Mejia,"	)	
EVA SANCHEZ,	(06), )	
ALFRED CASTRO,	(07), )	
ROBERT STEVEN RALSTON,	(08), )	
"JOHNNY" (LNU),	(09), )	
"RICO" (LNU),	(10), )	
	)	
Defendants.	)	

INDICTMENT

CR00-00244  
SOM  
LEK

COUNT 1

The Grand Jury charges that:

From on or about a date unknown, but from at least March 1, 2000 to on or about June 14, 2000, in the District of Hawaii and elsewhere, ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," ERIK ZUNIGA-MENDEZ, MARGARITA ELENA SANTOS, aka "The Old Lady," JAIME MEJIA GARCIA, LORENA ISABEL LEON OSORIO, aka "Myrna Mejia," EVA SANCHEZ, ALFRED CASTRO, ROBERT STEVEN RALSTON, "JOHNNY" (LNU), "RICO" (LNU), did conspire together with each other and with Enrique Alejandro Perez de la Hoya, aka "Quique," "Tavo" (LNU), Maria Eugenia Carrillo Zepeda, Susan Castellanos, not defendants herein, and with other persons unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, in excess of 100 grams.

All in violation of Title 21, United States Code, Section 841(a)(1).

Ways and Means of Accomplishing the Conspiracy

1) ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," and ERIK ZUNIGA-MENDEZ arranged to obtain quantities of heroin by courier and express mail shipments from "Tavo" (LNU) and Enrique Alejandro Perez de la Hoya, aka "Quique," in California and Mexico.

2) ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," and ERIK ZUNIGA-MENDEZ broke down the heroin received from California into ounces and grams for distribution in Honolulu.

3) ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," ERIK ZUNIGA-MENDEZ, and ALFRED CASTRO delivered ounces and grams of heroin to individuals in Honolulu.

4) The co-conspirators used long distance telephone calls, telephone pagers and cellular telephones to arrange for the distribution of heroin.

OVERT ACTS

In furtherance of and in order to accomplish the objects of the conspiracy, the defendants and their co-conspirators performed overt acts in the District of Hawaii and elsewhere, including but not limited to the following:

1) On or about March 7, 2000, in the District of Hawaii, Susan Castellanos, not a defendant herein, transported approximately 800 grams of heroin on board a Hawaiian Airlines flight to Honolulu.

2) On or about April 4, 2000, in the District of Hawaii, Maria Eugenia Carrillo Zepeda, not a defendant herein, transported approximately 800 grams of heroin on board a Hawaiian Airlines flight to Honolulu.

3) On or about May 6, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy,"

used a telephone to arrange to distribute a quantity of heroin in Honolulu.

4) On or about May 7, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," used a telephone to arrange to distribute a quantity of heroin in Honolulu.

5) On or about May 10, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," used a telephone to arrange to distribute a quantity of heroin in Honolulu.

6) On or about May 12, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," used a telephone to arrange to distribute a quantity of heroin in Honolulu.

7) On or about May 22, 2000, in the District of Hawaii, defendant JAIME MEJIA GARCIA used a telephone to arrange for a distribution of a quantity of heroin.

8) On or about May 23, 2000, in the District of Hawaii, defendant MARGARITA ELENA SANTOS, aka "The Old Lady," used a telephone to discuss the travel by a courier carrying heroin from California to Hawaii.

9) On or about May 24, 2000, in the District of Hawaii, defendant JAIME MEJIA GARCIA used a telephone to arrange for a distribution of a quantity of heroin.

10) On or about May 24, 2000, in the District of Hawaii, defendant LORENA ISABEL LEON OSORIO, aka "Myrna Mejia," flew to Honolulu on board a Hawaiian Airlines flight.

11) On or about May 24, 2000, in the District of Hawaii, defendant "JOHNNY" (LNU) used a telephone to arrange for a distribution of a quantity of heroin.

12) On or about May 24, 2000, in the District of Hawaii, defendant ROBERT STEVEN RALSTON used a telephone to arrange for a distribution of a quantity of heroin.

13) On or about May 25, 2000, in the District of Hawaii, defendant MARGARITA ELENA SANTOS, aka "The Old Lady," used a telephone to discuss the distribution of a quantity of heroin.

14) On or about May 29, 2000, in the District of Hawaii, the defendant "RICO" (LNU) used a telephone to discuss obtaining a quantity of heroin.

15) On or about June 2, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," used a telephone to discuss the travel arrangements of defendant EVA SANCHEZ with Enrique Alejandro Perez de la Hoya, aka "Quique," not a defendant herein.

16) On or about June 2, 2000, in the District of Hawaii and elsewhere, defendants EVA SANCHEZ and ALFRED CASTRO flew to Honolulu, Hawaii from California.

17) On or about June 3, 2000, in the District of Hawaii and elsewhere, defendant EVA SANCHEZ flew from Honolulu, Hawaii to Los Angeles, California.

18) On or about June 8, 2000, in the District of Hawaii, defendants ERIK ZUNIGA-MENDEZ and ALFRED CASTRO distributed a quantity of heroin to an individual in Honolulu.

19) On or about June 13, 2000, in the District of Hawaii, defendants ERIK ZUNIGA-MENDEZ and ALFRED CASTRO distributed a quantity of heroin to an individual in Honolulu.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges that:

On or about May 6, 2000, in the District of Hawaii, defendants ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," and ERIK ZUNIGA-MENDEZ did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 3

The Grand Jury further charges that:

On or about May 7, 2000, in the District of Hawaii, defendant ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," used and caused to be used a communications facility, that is, a

telephone, in causing or facilitating the commission of a distribution of a quantity of heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 4

The Grand Jury further charges that:

On or about May 10, 2000, in the District of Hawaii, defendants ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," and ERIK ZUNIGA-MENDEZ did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges that:

On or about May 12, 2000, in the District of Hawaii, defendants ALEJANDRO GUZMAN, aka "Toluco," aka "Eddy," and ERIK ZUNIGA-MENDEZ did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 6

The Grand Jury further charges that:

On or about May 15, 2000, in the District of Hawaii, defendant ROBERT STEVEN RALSTON used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession of a quantity of heroin, a Schedule I controlled substance, with intent to distribute, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 7

The Grand Jury further charges that:

On or about May 17, 2000, in the District of Hawaii, defendant ROBERT STEVEN RALSTON used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a distribution of a quantity of heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).



COUNT 8

The Grand Jury further charges that:

On or about May 17, 2000, in the District of Hawaii, defendant "JOHNNY" (LNU) did knowingly and intentionally possess with intent to distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT 9

The Grand Jury further charges that:

On or about May 18, 2000, in the District of Hawaii, defendant ROBERT STEVEN RALSTON used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a possession of a quantity of heroin, a Schedule I controlled substance, with intent to distribute, a felony under Title 21, United States Code, Section 841(a)(1).

..... All in violation of Title 21, United States Code,  
Section 843(b).

COUNT 10

The Grand Jury further charges that:

On or about May 22, 2000, in the District of Hawaii, defendant JAIME MEJIA GARCIA used and caused to be used a communications facility, that is, a telephone, in causing or

facilitating the commission of a distribution of a quantity of heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11

The Grand Jury further charges that:

On or about May 23, 2000, in the District of Hawaii, defendant MARGARITA ELENA SANTOS, aka "The Old Lady," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of heroin in excess of 100 grams, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 12

The Grand Jury further charges that:

On or about May 24, 2000, in the District of Hawaii, defendants MARGARITA ELENA SANTOS, aka "The Old Lady," and LORENA ISABEL LEON OSORIO, aka "Myrna Mejia," each aiding and abetting the other, did knowingly and intentionally possess with intent to distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code,  
Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 13

The Grand Jury further charges that:

On or about May 24, 2000, in the District of Hawaii,  
defendant JAIME MEJIA GARCIA used and caused to be used a  
communications facility, that is, a telephone, in causing or  
facilitating the commission of a possession of a quantity of  
heroin, a Schedule I controlled substance, with intent to  
distribute, a felony under Title 21, United States Code, Section  
841(a)(1).

All in violation of Title 21, United States Code,  
Section 843(b).

COUNT 14

The Grand Jury further charges that:

On or about May 24, 2000, in the District of Hawaii,  
defendant "JOHNNY" (LNU) used and caused to be used a  
communications facility, that is, a telephone, in causing or  
facilitating the commission of a possession of a quantity of  
heroin, a Schedule I controlled substance, with intent to  
distribute, a felony under Title 21, United States Code, Section  
841(a)(1).

All in violation of Title 21, United States Code,  
Section 843(b).

COUNT 15

The Grand Jury further charges that:

On or about May 25, 2000, in the District of Hawaii, defendant MARGARITA ELENA SANTOS, aka "The Old Lady," used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute a quantity of heroin in excess of 100 grams, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 16

The Grand Jury further charges that:

On or about May 29, 2000, in the District of Hawaii, defendant "RICO" (LNU) used and caused to be used a communications facility, that is, a telephone, in causing or facilitating the commission of a conspiracy to distribute heroin, a Schedule I controlled substance, a felony under Title 21, United States Code, Section 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 17

The Grand Jury further charges that:

On or about June 2, 2000, in the District of Hawaii, defendants EVA SANCHEZ and ALFRED CASTRO knowingly and

intentionally did travel in interstate commerce from Los Angeles, California, to Honolulu, Hawaii, with the intent to promote, manage, establish, carrying on, and facilitate the promotion, management, establishment and carrying on of an unlawful activity; said unlawful activity being the distribution of quantities of heroin, a Schedule I controlled substance, and thereafter did perform and attempt to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of said unlawful distribution of heroin.

All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNT 18

The Grand Jury further charges that:

On or about June 7, 2000, in the District of Hawaii, defendants ALFRED CASTRO and ERIK ZUNIGA-MENDEZ, each aiding and abetting the other, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 19

The Grand Jury further charges that:

On or about June 8, 2000, in the District of Hawaii, defendants ALFRED CASTRO and ERIK ZUNIGA-MENDEZ, each aiding and

abetting the other, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 20

The Grand Jury further charges that:

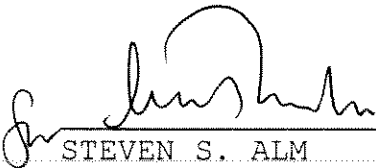
On or about June 13, 2000, in the District of Hawaii, defendants ALFRED CASTRO and ERIK ZUNIGA-MENDEZ, each aiding and abetting the other, did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

DATED: 14 June 2000, at Honolulu, Hawaii.

A TRUE BILL

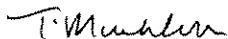
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FOREPERSON, GRAND JURY



STEVEN S. ALM  
United States Attorney  
District of Hawaii



ELLIOT ENOKI  
First Assistant U.S. Attorney



THOMAS MUEHLECK  
Assistant U.S. Attorney